Kansas Pipeline Safety

Issue #2
Spring '03

Using Work Performance History Review to Qualify

Under the OQ regulation, an operator can use Work Performance History Review (WPHR) to qualify employees or contractors if they have performed the task since before October 26, 1999. If the welder has been performing welding tasks for you since before this date, you may use this method. However, the operator must have documentation that shows:

- Records of contractor performing tasks since before 10/26/99
- Records that show the contractor has performed the task on a regular basis since that time.
- Criteria the operator would use for finding reasonable cause to question the contractor's capability.

The contractor must also be able to recognize abnormal operating conditions, (AOC's), and know

Continued...

Kansas Corporation Commission

Kansas Pipeline Safety

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Operator Qualifications (OQ)

If you have any OQ questions, please mail, email, or fax them to Leo Haynos. As part of the ongoing newsletter, we will try to provide informal interpretations/answers for all operators.

Operator qualifications, or OQ, requires that any person performing a covered task be qualified to do that task. Because many operators use contractors for operations and maintenance work, they must determine the contractors are qualified prior to them performing a covered task.

Keep in mind that all personnel that perform covered tasks on your system must be qualified according to your plan. This includes gas supplier personnel if the gas supplier provides pressure regulation, (regulator and relief valve maintenance), or cathodic protection for your facilities.

One of the common questions we receive is, "how should I qualify contractors that I hire?" There are two common ways qualify a contractor:

1. Accept a contractors OQ plan; or
2. Qualify each contractor to the operator's plan.

If you choose to accept the contractor OQ plan, then you must be prepared to audit his compliance with the plan. In other words, you would need to review how the contractor evaluates his employees, how often he evaluates them, how he tracks his employees' performance, does he evaluate them according to the procedures established by your operation, and are the contractor's evaluations comparable to your evaluations of your personnel performing the same covered task. Essentially, you would need to audit your contractor similar to the way the KCC audits your operations.

In the second method, which is more straightforward, the operator would evaluate the contractor to assure he is qualified. This method can be accomplished by using one or more of these evaluation techniques:

- on-site review of the contractor,
- review of a simulated task being performed by the contractor, or
- review of the results from a written test taken by the contractor.

Whichever method you select, you must document the criteria you will use to determine if the contractor is qualified and keep records of the contractor evaluation.

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Interpretation of the Number of Service/Yard Lines Necessary to be Included in a Defined Area

January 7, 2003

K.A.R. 82-11-4(k) requires the operator to re-evaluate all unprotected steel pipelines with electrical surveys every three years to determine if active corrosion is occurring. An electrical survey such as a close interval survey would determine "hot spots" and allow the operator to react to the potential threat to the line's integrity. The term active corrosion is defined as continuing corrosion which, unless controlled, could result in a condition detrimental to public safety. As such, electrical surveys can be considered a proactive approach to minimizing the safety risk of leaking gas.

The federal requirements in 49 CFR Part 192.457 and in 192.465(e) require an operator to perform electrical surveys of all unprotected steel pipe on a three year basis.

For service/yard lines, Kansas allows the operator to choose between doing a 3 year electrical surveys or conducting annual leak surveys and establishing a preventative maintenance program that will determine when the lines should be replaced. If the operator chooses the leak survey/preventative maintenance (PM) option, then Kansas requires certain items to be included as part of the PM program. These items are:

1. Operator shall prepare a summary of the leak survey results each year.
2. The summary must include the number of leaks found and lines replaced in a defined area.
3. The operator must replace all service/yard lines in a defined area when the number of lines that have leaked or been replaced due to corrosion reaches 25% of the lines in the defined area.
4. Once the defined area is triggered, replacement of all unprotected steel lines within the sector must be complete within 18 months.

Industry has presented the question of how many lines must be included in a defined area. Kansas regulations require and operator who chooses this option to develop a PM plan that includes a defined area. However, the regulation does not specifically address the minimum or maximum number of lines that should be included in a defined area. The regulation requires the PM plan to trigger a replacement of the sector if 25% of the service/yard lines in the sector develop corrosion leaks. It is the opinion of KCC Staff that the 25% requirement implies the minimum number of service/yard lines allowed in a sector would be four.

If a defined area was limited to four service/yard lines, each corrosion leak would require the replacement of three additional service/yard lines. This practice would be consistent with the use of a defined area to enhance a PM program that will replace a piping system that is deteriorating due to corrosion.

FYI...

Two new guidance manuals are available on the ***OPS website (ops.dot.gov)****:*

1. ***The 2002 edition of the Small Natural Gas Operators guidance manual.***
2. ***The new LP Gas Operators guidance manual.***

If you have any questions, please contact:

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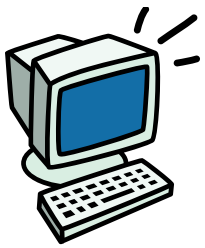

Please let us know if you would prefer to get this newsletter by email or U.S. mail. That would be a dollar-saver for us and faster!

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Using Work Performance History *continued...*

how to react to them if they should occur while they are performing a covered task for you. This would include AOC's specific to welding as well as general AOC's he may encounter while working for you. For this purpose, I would suggest you prepare a checklist of potential abnormal operating conditions that you could use to evaluate the welder's responses before he begins work.